

The Honorable John H. Chun

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

AMAZON.COM, INC., *et al.*

Defendants.

Case No. 2:23-cv-0932-JHC

**DECLARATION OF THOMAS
MAXWELL NARDINI IN SUPPORT
OF PLAINTIFF'S OPPOSITION TO
DEFENDANTS' MOTION TO
COMPEL RULE 30(b)(6)
DEPOSITION REGARDING THE
FTC'S OFFICIAL, PUBLIC
STATEMENTS ABOUT ROSCA**

I, Thomas Maxwell Nardini, declare as follows:

1. I am a staff attorney in the Division of Enforcement, Bureau of Consumer Protection at the Federal Trade Commission (FTC), counsel for the FTC in the above-captioned matter. My office address is 600 Pennsylvania Avenue, NW, Washington, DC 20580. I have personal knowledge of the facts set forth herein. If called as a witness, I could and would testify competently thereto.

2. On June 18, 2024, the FTC sent to Defendants a letter via email raising objections to Defendants' Rule 30(b)(6) deposition notice. **Exhibit 1** contains a true and accurate copy of the FTC's June 18, 2024 letter.

3. On September 5, 2024, Defendants sent the FTC an email containing the final 30(b)(6) deposition topics for the September 10 & 11, 2024 Rule 30(b)(6) deposition of the FTC. **Exhibit 2** contains a true and accurate excerpted copy of that email. Exhibit 2 is excerpted to include only the email containing the list of 30(b)(6) topics.

4. **Exhibit 3** contains a true and accurate excerpted copy of the Rule 30(b)(6) deposition testimony of FTC Assistant Director of the Enforcement Division Amanda Basta. Exhibit 3 is excerpted to include testimony relevant to the FTC's Opposition.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 15, 2024

/s/ Thomas Maxwell Nardini
Thomas Maxwell Nardini